

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF VERMONT**

MID VERMONT CHRISTIAN SCHOOL,
on behalf of itself and its students and its
students' parents; **A.G.** and **M.G.**, by and
through their parents and natural guardians,
Christopher and Bethany Goodwin;
CHRISTOPHER GOODWIN, individually;
and **BETHANY GOODWIN**, individually,

Plaintiffs,

v.

ZOIE SAUNDERS, in her official capacity
as Interim Secretary of the Vermont Agency
of Education; **JENNIFER DECK
SAMUELSON**, in her official capacity as
Chair of the Vermont State Board of
Education; **CHRISTINE BOURNE**, in her
official capacity as Windsor Southeast
Supervisory Union Superintendent;
HARTLAND SCHOOL BOARD;
RANDALL GAWEL, in his official
capacity as Orange East Supervisory Union
Superintendent; **WAITS RIVER VALLEY
(UNIFIED #36 ELEMENTARY)
SCHOOL BOARD**; and **JAY NICHOLS**,
in his official capacity as the Executive
Director of The Vermont Principals'
Association,

Defendants.

Case No. 2:23-cv-00652-gwc

**PLAINTIFFS' LIST OF CO-
EDUCATIONAL COMPETITIONS
AND ACTIVITIES**

Pursuant to this Court’s Order of July 23, 2024 (ECF No. 70), Plaintiff Mid Vermont Christian School notifies the Court that it believes it could participate in all co-educational (including both boys and girls) school competitions and activities sponsored by the Vermont Principals’ Association (“VPA”) without violating its religious beliefs. Mid Vermont Christian is aware of the following VPA-sponsored co-educational competitions and activities that are listed on the Vermont Principals’ Association’s website:

1. Vermont State Spelling Bee
2. Vermont Geo-Bee
3. Vermont Drama Festivals
4. Vermont Mathematics and Science Fairs
5. Vermont Debate and Forensics League

Mid Vermont Christian students would also be eligible for scholarships handed out by the VPA.

To the extent that there are additional co-educational competitions and activities (not listed on the VPA’s website), Mid Vermont Christian requests to participate in those as well. The VPA would know the complete list of all competitions and activities which exist.

Nevertheless, Mid Vermont Christian is concerned that despite the Court’s efforts to determine programs the School can participate in that do not violate its religious beliefs, the VPA has now said the School must “agree[]” to “make no statement that would stigmatize or discriminate against students[.]” VPA July 26, 2024 Letter to Counsel (ECF No. 72-1). Although Mid Vermont Christian would not violate its religious beliefs by competing against transgender students in co-educational competitions and activities, Mid Vermont Christian requires its students and staff to use pronouns based on sex. *See* Verified Complaint ¶ 49 (ECF No. 1). The VPA should state whether it would force Mid Vermont Christian to use preferred pronouns in co-educational competitions and activities.

Dated: July 29, 2024

Respectfully submitted,

s/ David Cortman

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**Admitted pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will serve all counsel of record.

s/ David Cortman
David Cortman
Counsel for Plaintiffs